

Hearing Date and Time: March 31, 2011 at 10:00 a.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08 – 13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**JOINDER OF FORTIS INVESTMENT MANAGEMENT BELGIUM
NV/SA IN THE RESPONSE OF THE ROYAL BANK OF SCOTLAND PLC
TO DEBTORS' EIGHTY-EIGHTH AND NINETIETH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Fortis Investment Management Belgium N.V./S.A. ("**Fortis**") hereby joins in the Response of the Royal Bank of Scotland plc to the Debtors' Eighty-Eighth and Ninetieth Omnibus Objections to Claims (No Liability Claims) filed on March 15, 2011 [Docket No. 15039] (the "**Response**").

JOINDER

1. Fortis is the holder of claim numbers 62830, 62831 and 62832 (the "**Fortis Claims**") filed against debtor Lehman Brothers Holdings Inc. ("**LBHI**"). Like the

claims held by the Royal Bank of Scotland plc (“**RBS**”) described in the Response, the Fortis Claims are based on preferred securities included on the above-captioned debtors’ (the “**Debtors**”) list of Lehman Program Securities (as defined in the Response) and guaranteed by Lehman Brothers Holdings plc (“**LBH**”).

2. On June 9, 2005, the Executive Committee of the Board of Directors of LBHI adopted a unanimous written consent resolution (the “**Resolution**”) by which LBHI fully guaranteed all obligations, liabilities and commitments of various LBHI subsidiaries, including LBH. Accordingly, Fortis holds guarantee claims against LBHI.

3. On February 11, 2011, the Debtors filed their Ninetieth Omnibus Objection to Claims (No Liability Claims) [Docket No. 14553] (the “**Objection**”) seeking, among other things, to disallow the Fortis Claims.

4. Fortis joins in the Response to the Objection for all the reasons set forth in the Response, including on the grounds that the Resolution provides Fortis with valid guarantee claims against LBHI.

WHEREFORE, Fortis hereby joins in the relief sought in the Response and requests the Court deny the Objection with respect to the Fortis Claims and grant such other relief as is just and proper.

Dated: New York, New York
March 16, 2011

SHEARMAN & STERLING LLP

By: /s/ Michael H. Torkin
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